TN
872
.A7
S362
1982

3 3755 000 52380 3

**ARLIS**
Alaska Resources Library & Information Services
Library Building, Suite 111
3211 Providence Drive
Anchorage, AK 99508-4614

# The Scoping Process As A Decision Framwork:

## The NPR-A Experience

U.S. Department of the Interior
Bureau of Land Mangement

Alaska State Office
NPR-A Program Staff
Anchorage, Alaska

Fairbanks District Office
NPR-A Project Office
Fairbanks, Alaska

May, 1982

## I. Introduction

To promote a continued flow of oil and natural gas into the U.S. economy, Congress instructed the Department of the Interior (DOI) to begin a program of oil and gas leasing in the National Petroleum Reserve in Alaska. Before initiating such a program the Bureau of Land Management, as leasing agent for the DOI, must comply with the National Environmental Policy Act (NEPA). As interpreted by the Council on Environmental Quality (CEQ), NEPA requires a Federal agency to:

A. Determine whether its decisions would so alter the human environment that the responsible Federal official should conclude that the proposed decision(s) constitute a major Federal action; and,

B. Should the responsible official conclude that the decision constitutes a major Federal action, then the agency must initiate and prepare an Environmental Impact Statement (EIS).

## II. Additional CEQ Guidance

To assist in this determination, CEQ developed the screening and decision tool called scoping. Among its benefits scoping can:

A. Identify (1) values such as rare plants or animals, scarce recreation opportunities, unique ecosystems, and (2) unusual features such as sculptured sandstones or (3) other issues which are highly regarded by the public;

B. Involve the public in developing alternatives which would both allow the valuable new uses of the public land (in this case oil and gas development) and protect the highly regarded values, features, and areas;

C. Provide the decisionmaker in the Federal agency with information to help "sort" those issues which require in depth EIS analysis from those which do not.

This sorting feature of scoping is the subject of this report.

## III. Scoping as a Clarifying and Facilitating Process

To begin a sorting process whereby some values or issues may be found to warrant EIS treatment while others do not it is necessary to perform four tasks they are:

1. Develop a "logic" for determining which values or issues are significant;

2. List the values or issues to which the logic will be applied;

3. Provide the public with an opportunity to comment on the adequacy of the logic and the completeness of the list of values or issues; and,

4. Use the logic and public comments to choose which values or issues warrant EIS treatment.

## IV. Public Involvement in Scoping

In February of 1982, the BLM distributed the Scoping Document for Future Oil and Gas Leasing in NPR-A. This scoping document identified the following issues as likely to merit EIS analysis.

1. Biological Resources
    a. Caribou
    b. Other Biological Resources
        (1) Dall Sheep
        (2) Grizzly Bear
        (3) Polar Bear
        (4) Shorebirds
        (5) Geese
        (6) Ducks

It indicated that the following values may not merit further consideration in an EIS.

1. Biological Resources
    a. Moose
    b. Wolf
    c. Wolverine
    d. Arctic Fox
    e. Red Fox
    f. Muskox Habitat
    g. Tundra Hare
    h. Gulls, Terns and Jaegers
    i. Ptarmigan
    j. Passerines
    k. Peregrine Falcons
    l. Other Raptors
    m. Loons
    n. Whistling Swans
    o. Fisheries
    p. Threatened and Endangered Plants
2. Other Issues
    a. Slope
    b. Soil/Permafrost
    c. Off-road Traffic

The logic used to sort values and issues into those warranting EIS treatment and those not needing EIS consideration was based on operationalizing the NEPA significance criteria. Those NEPA criteria, as published in the February Scoping Document, are shown in Table A-1 below. These NEPA criteria are drawn from guidance provided by the Council on Environment Quality at 40 CFR 1508.27.

3 3755 000 52380 3

ARLIS
Alaska Resources
Library & Information Services
Anchorage, Alaska

## TABLE A-1

## NEPA Criteria Pertinent to NPR-A

1. Unique characteristics of the geographic area such as proximity to ... wetlands... or ecologically critical areas...

2. The degree to which the effects... are likely to be highly controversial.

3. The degree to which the possible effects... are highly uncertain or involve unique or unknown risks.

4. The degree to which the action may establish a precedent for future actions with significant effects or represent a decision in principle about a future consideration...

5. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts the significance exists if it is reasonable to anticipate cumulatively significant impact on the environment. Significiance cannot be avoided by terming an action temporary or by breaking it down into component parts.

6. The degree to which the action may adversely affect... or may cause loss or destruction of significant scientific... resources.

7. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973...

8. Whether the action threatens a violation of Federal, State or local law or requirements imposed for the protection of the environment.

To "operationalize" these criteria the NPR-A staff converted them to "testable" statements (statements which can be answered either yes or no; statements which can be measured). This was done by identifying five factors which cumulatively (through their interactions) determine the level of significance. The first three factors include (1) the sensitivity of the value to man's activities, (2) the proportion of the value which will be exposed to man's activities (including cumulative impacts from concurrent development), and (3) the perceived worth of the value to the public (Is the value highly regarded?).

Factor four is the advance mitigation factor. Under BLM guidance (Instruction Memorandum 82-105) if mitigation measures will reduce the level of impacts then the mitigations should be applied in advance of determining significance. It is very important that mitigation(s) be developed in advance as factor five, public controversy, is only germane if there would be significant effects on the value in question (see Table A-1 NEPA criteria two). If significant effects can be mitigated then controversy is no longer relevant.

The public response to this scoping document was very helpful. A brief summary of the major comments is shown in Appendix One. Values which the commentors felt were of EIS significance under the criteria in Table A-1 are:

Moose on the Colville
Wolves
Wolverines
Gulls, Terns and Jaegers
Peregrine Falcon
Other Raptors
Loons
Whistling Swans
Fisheries
Arctic and Red Fox
Muskox Habitat

## V. State Director Decisions*

Based on the comments received during the EIS scoping process and staff recommendations, the State Director of the BLM in Alaska has made the following decision regarding the scope of issues to be considered in the EIS:

A. The values shown in Table A-2 below will be comprehensively analyzed in the EIS. When viewed in terms of the five significance factors set out above, the State Director concluded that the values or issues shown in Table A-2 were:

1. Very sensitive to industrial activity;

2. Likely to be exposed to industrial activity; and

3. Of high perceived worth to the public.

Effective mitigation (factor four) of the effects of oil and gas development on these values or issues can not be assured prior to completion of further analysis. These values and issues thus warrant EIS treatment.

---

* The State Director, Alaska, Bureau of Land Management is the responsible Federal official for NEPA compliance regarding NPR-A leasing.

## TABLE A-2

| Staff Identified Values [1] | | Values Where Public Comments Indicated In Depth Analysis Was Appropriate [2] | |
|---|---|---|---|
| **Value** | **Treatment** | **Value** | **Treatment** |
| Caribou | Site specific, area-wide and regional impact analysis with developement of detailed mitigation(s). | | |
| Grizzly Bear | Site specific and area-wide impact analysis with development of general protections. | Peregrine Falcon | Site specific, area-wide and regional impact analysis with development of detailed mitigation(s). |
| Polar Bear | Develop general mitigation(s) to protect habitat and use of that habitat. | Other Raptors | Develop general mitigation(s) to protect habitat. |
| Geese | Impact analysis will concentrate on high density areas with design of general protections, especially for the Teshekpuk Lake Goose Molting area. | | |

---

[1] Values listed in the February Scoping Document as meriting EIS treatment.
[2] Values identified in public comments in response to the Scoping Document.

B. Values of Lesser Concern to the Public which, nonetheless, the public wanted to see discussed in some degree in the EIS are shown in Table A-3. The EIS analysis of these values will be more limited.

TABLE A-3

| Value | Treatment |
|---|---|
| Water Availability and Use | Conflicting water uses will be discussed in the development assumptions. |
| Gravel/Sand Availability and Use | Same as water above. |
| Moose | Many major riparian areas on the Reserve are important to moose, especially as winter habitat. However, several factors indicate that the moose/riparian relationship can be adequately protected during the permitting process. The EIS discussion will be limited to design of stipulations to prevent concentrated alteration of riparian habitat. |
| Wolverine | Areas of preferred habitat for wolverine can be inferred in NPR-A. Mitigations can be design to assure that no significant impacts will occur. The EIS discussion will be limited to design of stipulations to prevent the creation of nuisances which would attract these animals to development (public health concerns), limit habitat alteration, and prohibit hunting by project personnel. |
| Whistling Swans, Shorebirds and Ducks | Potential conflicts can be resolved during the permitting and NEPA review process preceeding any operations on the Reserve. EIS discussion will be limited to design of specific permit stipulations and management options to be applied to all activities posing potential conflicts with these species. |
| Wolves and Dall Sheep | Little chance exists that these species, confined as they are to the Brooks Range, would ever be exposed to oil and gas activity. The EIS will focus on general impacts and mitigations for these species. |
| Fisheries | Treat as a subsistence resource with general impact and mitigation analysis. |

The five significance factors were again used in determining the level of significance and the appropriate level of EIS treatment. For example, moose are known to adapt well to man's activities in general and to oil and gas development specifically (as evidenced by moose population dynamics in the area of the Swanson River oil field and in and near the Fort Richardson Army Base). Moose are not very sensitive to man's activities so long as those activities are controlled to preclude harassment of moose and/or to protect moose habitat. The focus of the EIS will, therefore, be on preventing harassment of moose and minimizing alteration of moose habitat.

A low proportion of wolverine, Dall sheep, and wolves will be exposed to man's activities (factor two). Wolverine are broadly dispersed over the Reserve while oil and gas activities will be concentrated into a few areas. Dall sheep and wolves occur in areas where oil and gas activity is unlikely and/or where design solutions and no surface occupancy restrictions would provide adequate protection. It is, therefore, appropriate to concentrate on mitigating the effects of oil and gas activities rather than to prepare detailed analyses of those effects.

A low proportion (and a small absolute number) of whistling swans, shorebirds and ducks (factor two) would ever be influenced by oil and gas activities. Habitat used by these species can be protected by stipulations. By judicious use of no surface occupancy stipulations and by control of noise and the operating altitude of aircraft the effects on ducks, shorebirds and swans can be mitigated (factor four). It is, therefore, appropriate to focus the EIS analysis on design of mitigating measures.

C. Limiting the scope of the analyses to values previously discussed.

The State Director, BLM, Alaska has decided to give EIS consideration only to those biological resources and other noteable values discussed in (V-A) and (V-B) above.

Even though comments were received favoring the treatment of potential muskox and tundra hare habitat, gulls, terns, jaegers, ptarmingans, passerines, Arctic and red fox, loons and threatened and endangered plants in the EIS, these values will not be treated further (see Tables A-4, A-5 and A-6). The NPR-A staff remains convinced of the validity of the conclusions in the February Scoping Document regarding these species.

No public comments were received during the scoping process that would require expanding the list of species used for the scoping process. The original justification for the choice of representative species was presented in the NPR-A Task Force, "105(c) Final Study", Volume 1, Page 67, published in April, 1979. Thus all values not discussed in (V-A) or (V-B) are found to lack EIS significance.

## VALUES ANALYZED UNDER FACTOR FOUR
(advance mitigation)

### Threatened and Endangered Plants

Although none of these species [1/] are officially listed as threatened or endangered, it is BLM policy (BLM Manual Section 68-40, IM AK80-722, change 1) to provide protection to proposed species equivalent to officially listed species. In addition, a 1979 amendment to the Endangered Species Act of 1973 provides partial protection to species formally proposed for listing. These four species were recognized as proposed in the Federal Register of December 15, 1980 Vol. 145, No. 242. The State of Alaska has the same threatened and endangered plant list as the Federal government.

### Threatened and Endangered Plant Stipulation

The applicant for any APD from MMS or other permit from BLM will assure that no operations or facility will occur on, or within 25 meters of, any threatened or endangered plant. Emissions from facilities and operations will be maintained within acceptable limits.

### Gulls, Terns and Jaegers

The coastal areas favored by these birds are subject to erosion and will be off limit to permanent facilities (airstrips, pads, etc.). Waste disposal will be controlled to prevent attraction of gulls, terns and jaegers to development. These no surface occupancy stipulations and sanitation measures will reduce potential impacts. During the permitting process nesting sites will be identified and all efforts will be made to redesign operations to avoid nesting areas.

## VALUES ANALYZED UNDER FACTOR TWO
(low exposure)

### Muskox Habitat

Under the most optimistic assumptions concerning petroleum production in NPR-A less than 500 square miles of muskox habitat would be influenced by oil and gas development. For comparison purposes there are about 20,000 square miles of best potential muskox habitat within NPR-A. Even if 500 square miles (2%) of muskox habitat could not be protected from degradation by stipulation (it will be so protected) the habitat would be rehabilitated before the muskox (if reintroduced) could approach a population level requiring all 20,000 square miles of habitat.

[1/] The four species are Mertensia drummondii, Salix ovalifolia var. glacialis, Erigeron muirii and Montia bostockii.

## TABLE A-5

### VALUES ANALYZED UNDER FACTOR FOUR

### Loons

Three of the four species of loon occur regularly on coastal plain while a fourth species is found occassionally in southern NPR-A.

### Stipulation

All activities and structure on the Coastal Plain and Shoreline of NPR-A will be designed to minimize alteration, destruction or encroachment upon preferred loon habitat in various classes of wetlands. The Applicant for any APD from MMS or other permit from BLM will make activity area maps identifying preferred loon habitat including nesting areas, within one mile of the activity site. These maps will be submitted with the permit application for any activity occurring between June 1 and August 30th of each year. These maps will be the basis for restricting facility siting, surface entry, fixed-wing aircraft flights below 500 vertical feet and helicopter flights below 1500 vertical feet within one-quarter mile of preferred loon habitat during the snow free season. The DMM, with the concurrence of the Fairbanks DM, BLM, may grant exceptions when it can be shown by the Lessee or applicant that activities will not likely have an adverse effect upon loons or their preferred habitat during the snow free season.

Exceptions in any year must be specifically authorized in writing by the DMM, Onshore Field Operation, Alaska Region, MMS, with the concurrence of the Fairbanks District Manager, BLM.

### VALUES ANALYZED UNDER FACTOR TWO

### Tundra Hare Habitat

There are no tundra hare in NPR-A. Much of potential tundra hare habitat is along rivers which are currently withdrawn from leasing and/or which would be subject to broad zones of no surface occupancy to protect peregrine falcon, subsistence fisheries and/or moose. Less than five percent of tundra hare habitat would ever be subject to development. The habitat would be rehabilitated after operations are abandoned.

# TABLE A-6

## VALUES ANALYZED UNDER FACTOR FOUR

### Arctic and Red Fox

All activities and structures within NPR-A will be designed to minimize alteration, destruction or encroachment upon preferred:

1. Arctic fox denning areas in pingos, dunes, ridges, river terraces and banks, and old lakeshore banks and feeding areas on the coastal plain and sea coasts of NPR-A; and

2. Red fox denning and feeding areas in river drainages and associated high-brush habitat.

### Stipulation

The applicant for any APD from MMS or other permit from BLM will map all preferred fox habitat within five (5) miles of the activity site and will submit site and activity specific plans for eliminating attractions to foxes such as improper garbage disposal, artificial feeding by workers or other human/fox interaction. Fencing may be needed to be protect facilities from damage by foxes. Rabies is endemic in the Arctic fox and the applicant will be required to make possible hazards clear to all personnel in the environmental training program. These maps and plans will be the basis for resticting facility siting and activities in or near preferred habitat for foxes. The DMM, with the concurrence of Fairbanks DM, BLM, may grant exceptions for facility siting when it can be shown by the Lessee or applicant that activities will not likely have an adverse effect on foxes or their preferred habitat. Exceptions in any year must be specifically authorized in writing by the DMM, Onshore Field Operations, Alaska Region, MMS, with the concurrence of the Fairbanks District Manager, BLM.

## VALUES ANALYZED UNDER FACTOR TWO

### Passerine and Ptarmigan

Passerine and ptarmigan are widely dispersed within favorable habitat. Less than five (5) percent of passerine and ptarmigan habitat would be exposed to oil and gas development and within this exposed area habitat alteration can be regulated by stipulation.

# APPENDIX ONE

## Content Analysis
## of
## Public Comments

## Content Analysis
## Birds

| Commentors | Riverine and Coastal Birds | Wetlands and Other Birds | General Statement |
|---|---|---|---|
| State of Alaska Governmental Coordination Unit | | Whistling Swans - There is a potential for impacts beyond the level that may be mitigated at the permitting stage. Uncertainty of future sales. Address in EIS.<br>Geese - Geese meet NEPA test for significance in the EIS. BLM should not rely on mitigation in order to avoid the EIS requirements on geese. | |
| U.S. Fish and Wildlife Service | Other Raptors - Other oil and gas development outside NPR-A will impact and add to impacts of activities in NPR-A. Stipulations to protect these species need to be addressed in EIS.<br>Shorebirds - Pre-migration staging and migration use of littoral habitat needs to be discussed in EIS; discuss impacts of State leases May 15 and September 30. | Geese - Teshekpuk Lake is important to populations from Wrangell Island, central and western Alaska, and Arctic Canada and is of international significance. Correct waterfowl statements and numbers in documents.<br>Whistling Swans - Impacts need to be considered in EIS if leasing is considered in Colville River/Fish Creek Deltas. | |
| Bureau of Land Management NPR-A - FDO | Peregrine Falcon - Potential nesting sites could occur on any tract. | | |
| Bureau of Land Management Washingon Office | | Geese - EIS needs narrative explanation on population density figures. | |

## Content Analysis
## Birds (cont'd)

| Commentors | Riverine and Coastal Birds | Wetlands and Other Birds | General Statement |
|---|---|---|---|
| National Wildlife Federation | Peregrine Falcon - NEPA requires protection regardless of Endangered Species Act. EIS needs to discuss potential impacts. Emphasis shall be on criteria #3 and 7 of NEPA criteria in Scoping Document. BLM should designate Bird of Prey Natural Area. The EIS should address reproductive success.<br>Other Raptors - (IACV) are an important and controversial value and should be discussed in EIS.<br>Shorebirds - (IACV) Concurrent leasing of "less than" all high density habitat may produce cumulative significant impacts. (IACV). | Terns, Gulls, and Jaegars - (IACV)*<br>Whistling Swans - (IACV) Discuss in EIS. Habitat is ecologically critical. Evaluate in a more localized context. Discuss impacts of oil and gas activities on the population.<br>Loons - (IACV) Discuss in EIS. Account for production and development activities other than winter exploration. | Statements in the February Scoping imply that swan habitat appears not to be ecologically critical. Leasing will significantly impact swans one way or another. |
| National Wildlife Federation Raptor Information Center | Peregrine Falcon - Expect an increase in people and recreation impacts.<br>Consider leasing impacts for species and nesting density below potential. Need oil and gas stipulations for leases to safeguard unoccupied nest cliffs. Adequate protection of habitat occupied by non-breeders should be addressed. EIS should address impacts on prey population and do food habit studies for impact assessment.<br>Other Raptors - (IACV) Same. | | |

* IACV - Important and Controversial Values

## Content Analysis
### Birds (cont'd)

| Commentors | Riverine and Coastal Birds | Wetlands and Other Birds | General Statement |
|---|---|---|---|
| Alaska Center for the Environment | Peregrine Falcon - Birds of Prey Natural Area.<br>Other Raptors - (IACV) | Whistling Swans - (IACV) | |
| Northern Alaska Environmental Center | Peregrine Falcon - Designate Birds of Prey Natural Area. Suggest no surface occupancy in a 15 miles radius of nests.<br>Other Raptors - Recommend small radius of protected habitat for other raptors.<br>Shorebirds - Suggest phased leasing of high value wetlands. | Whistling Swans - (see Shorebirds)<br>Geese - Consider phased leasing of high value wetlands.<br>Ducks - (Same as geese). Do not balance dollars and ducks in mitigation but stress habitat protection. | Recommend protection alternatives in areas of documented wildlife utilization. Suggest specifying wetland habitat types and identify appropriate area for withdrawal leasing.<br>Recommend not gambling with unique and irreplacable moulting concentrations at Teshekpuk Lake. Should consider phased leasing of high value wetlands and extrapolate data on waterfowl use of specific habitat. |
| D.W. Mitchell | Peregrine Falcon - Sufficiently protected under ESA. | | |
| Exxon | Shorebirds - Species not affected by Exxon drill activities. | | Oil operations or activities have not disturbed wildlife (waterfowl) at Point Thomson drill site. |

## Content Analysis
## Birds (cont'd)

| Commentors | Riverine and Coastal Birds | Wetlands and Other Birds | General Statement |
|---|---|---|---|
| Amy Klar | Peregrine Falcon - Recreation use disturbs birds in Umiat and Nuiqsut. Address protection in the EIS.<br>Other Raptors - EIS needs to address protection for other raptors. | | |
| Mary Core | Peregrine Falcon - EIS needs to address protection of peregrine nesting. Designate Bird of Prey Natural Area.<br>Other Raptors - EIS needs to address protection of all raptors. | | |
| Bob Dittrick | Peregrine Falcon - EIS should address effects on nesting success due to increased oil and gas development and number of people at Nuiqsut and Umiat. Increased recreation will require protection for historic nest sites as well as current ones. Designate Birds of Prey Natural Area. Address Colville River area as a critical habitat. Reinstate this species as an issue to be addressed in the EIS.<br>Other Raptors - EIS needs to address protection of other raptors. | | |

## Content Analysis
## Birds (cont'd)

| Commentors | Riverine and Coastal Birds | Wetlands and Other Birds | General Statement |
|---|---|---|---|
| Students of Abbott Loop School | Peregrine Falcon - 29 students of Abbott Loop School commented on sheltering peregrine falcon from needless harm, preserving raptor habitat and managing the Colville River to enhance its unique values. | | |
| Clayton White | Peregrine Falcon - Designate Birds of Prey Natural Area. Suggest an adequate overview of the entire raptor ecosystem be made. Reanalyze conclusions on Colville River raptor fauna. | | |

## Content Analysis
## Large Mammals

| Commentors | Caribou | Moose | Muskox | Polar Bear | Marine Mammal | General Statement |
|---|---|---|---|---|---|---|
| State of Alaska Govermental Coordination Unit | Discuss impacts of oil and gas activities on caribou.<br>(Same comment on general statement) | Oil and gas development may disrupt high density moose population on Utukok. Coville River moose near Nuiqsut are a moderate subsistence resource not a marginal one as stated in Scoping Document. | EIS should assess potential of musk-ox habitat. Recommend that BLM reintroduce species as a management priority which should be left open ended. | | | Species needs to meet NEPA test for significance in EIS. BLM should not rely on mitigation in order to avoid EIS requirements.<br>EIS needs to consider each alternative and analyze the potential beneficial and detrimental impacts on populations and the environment for all wildlife species. |
| State of Alaska Department of Fish and Game | Recognize calving grounds as critical habitat and restrict oil and gas exploration, drilling, development during 5/15-7-15.<br>Update your information on caribou calving areas (Meade, Titaluk, Kigalik Rivers). | | | | | |

Content Analysis
Large Mammals (cont'd)

| Commentors | Caribou | Moose | Muskox | Polar Bear | Marine Mammal | General Statement |
|---|---|---|---|---|---|---|
| U.S. Fish and Wildlife Service | Transportation cooridors may affect the species and there is a need for information on the interior. | | | | | |
| BLM NPR-A - FDO | Caribou migration patterns change yearly and could affect leasing. | | | | | |
| National Wildlife Federation | State the significance for Criteria Nos. 3 and 7 of Scoping Document. | | | Sacrificing animals because numbers constitute a relatively small percent of North America Arctic or NPR-A population is not acceptable. | | Oil and gas development may disrupt high density predator populations and caribou needed by (predator) species in Utukok. |
| Northern Alaska Environmental Center | Recommends withdrawal-leasing. EIS needs to designate an ACEC for calving and year around use. | | | Evaluate importance of bear maternity denning area. See grizzly bear. | | |

## Content Analysis
## Large Mammals (cont'd)

| Commentors | Caribou | Moose | Muskox | Polar | Marine Mammal | General Statement |
|---|---|---|---|---|---|---|
| Tanana Chief Conference, Inc. | (IACV). EIS needs a statement on wider subsistence use of Western Arctic Caribou Herd. Needs more conservative lease decisions in EIS. | | | | | |
| D.W. Mitchell | BLM needs current data to sufficiently support conclusions regarding development and wildlife interaction and impacts. | | | | | BLM is too conservative in analysis of impacts of exploration and development on species. |
| Exxon | There is no evidence that oil industry operations on North Slope discourages caribou propagation or calving. EIS should bring this out. | | | | | Revise phrase on Page 36 subparagraph (a), line 3 explanation will have little or no effect on these species. |

## Content Analysis
## Fish and Small Mammals

| Commentors | Fish | Fox (Arctic and Red) | Wolverine | General Statement |
|---|---|---|---|---|
| State of Alaska Governmental Coordination Unit | Each alternative of the EIS should analyze potential beneficial or detrimental impacts on fish. | | | |
| National Wildlife Federation | | Species that are important and controversial need to be discussed in EIS. EIS document needs mitigating measures to protect denning habitat. | EIS should provide adequate data to show unique or ecologically critical habitat.<br>Oil and gas development may disrupt high density population of species on Utukok. Wolverines also depend on caribou for food. (Same as fox-denning). | |
| Alaska Center for the Environment | Human activity will impact fish so mitigation measures are needed. | | | |
| Northern Alaska Environmental Center | Protection of fish habitat is needed. No surface occupancy suggested by NAEC. EIS needs more fisheries information. | | | |

## Content Analysis
## Brooks Range Values/Issues

| Commentors | Grizzly Bear | Dall Sheep | Wolves | General Statement |
|---|---|---|---|---|
| State of Alaska Governmental Coordination Unit | | | | Standard mitigation should not be used to subvert NEPA process for species. |
| National Wildlife Federation | Oil and gas development will be controversial in areas other than Utukok Uplands. | | BLM's conclusions that restrictions or stipulations will give adequate protection is unjustified. Where is wolf denning habitat? Where are denning sites? What activities will be prohibited? Mitigating measures are need to protect denning habitat. Wolves depend on caribou. | |
| Northern Alaska Environmental Center | Complete data gathering or evaluation of the ecological importance of the high density populations.<br>Consider a design solution for leasing that will minimize human activity and bear-human encounters on a seasonal basis. This is especially true where conflicts involve garbage or waste. | There should be no surface occupancy on the lick areas. There is a need for seasonal restrictions in sheep areas. Completion of data gathering on sheep is recommended. | | |
| Alaska Center for the Environment | | | | Human activities will impact wildlife so mitigation measure should be considered. |

## Content Analysis
## Pristine Quality

| Commentors | General Statement |
|---|---|
| State of Alaska Governmental Coordination Unit | EIS should discuss pipeline(s) crossing the Colville River and support facilities. |
| National Wildlife Federation | EIS needs to discuss the visual impacts outside of the wild and scenic study river corridor that can be seen from within river (study) corridors. |
| Northern Alaska Environmental Center | The impacts of transport systems on specific remote areas is required in EIS. Impacts of development must be prepared for these critical areas. NAEC recommends maintenance of the wild and scenic river status. They recommend no surface leasing or withdrawal leasing in Colville area. |
| Bob Dittrick | Wilderness values in the Colville River and elsewhere on NPR-A are unsurpassed. |